From: <u>Valerie Oster</u>

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Chip, Eric,

Jim and Bob requested that I send you the following for today's call on Fate and Transport:

EPA commented on January 15, 2008 that chemical degradation rates should be set to near zero and did not recognize that degradation rates are one of a few potentially useful calibration parameters. In later discussions, EPA indicated they would prefer that a "realistic" degradation rate be chosen and applied and that model calibration need not be conducted. The LWG expressed concerns that EPA's proposed approach has larger ramifications because calibration of models is required under EPA guidance for well founded technical reasons. Discussion also included the concept of selecting a reasonable range of realistic degradation rates and that selected values in that range could be compared to empirical data as an "approximate" calibration procedure. The LWG has concerns about working with a model that is not calibrated (i.e., application of a preselected degradation rate).

For technical defensibility, the LWG needs to calibrate the model (with degradation and/or other parameters such as estimated source loads) to make formal assessments of model uncertainty. The LWG could also run the model using EPA's pre-selected degradation rate values and compare those results to empirical data consistent with EPA's suggested "approximate" calibration procedure. The model run using the pre-selected degradation value that most closely approximates empirical data could then be compared to the fully calibrated model and if possible, adjusted so that a similar calibration is achieved using the pre-selected degradation value. This version of the model could then be used for various future modeling assessment purposes (e.g., evaluation of recontamination potential in the FS).

thanks valerie

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